



Sheppard Mullin Richter & Hampton LLP  
30 Rockefeller Plaza  
New York, New York 10112-0015  
212.653.8700 main  
212.653.8701 fax  
[www.sheppardmullin.com](http://www.sheppardmullin.com)

212.634.3023 direct  
[skirby@sheppardmullin.com](mailto:skirby@sheppardmullin.com)

November 27, 2023

**VIA ECF**

Honorable Jennifer E. Willis, U.S.M.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *Franco v. 380 Second LLC, et al.*  
Case No. 1:22-cv-04011-AS-JW

Dear Judge Willis:

This firm represents Defendant 380 Second LLC in connection with the above-referenced matter. Pursuant to the Court's Order dated November 17, 2023 (Dkt. No. 86), I write on behalf of, and with the consent of, all parties to respectfully propose the following briefing schedule for dispositive motions in this action:

1. December 29, 2023 – Moving Papers Due
2. January 29, 2024 – Opposition Papers Due
3. February 12, 2024 – Reply Papers Due

In addition, the parties reserve the right to request that the foregoing proposed schedule be modified should their respective expert witnesses need to conduct follow-up inspections of the premises in connection with such dispositive motions.

We appreciate Your Honor's consideration of this proposed schedule, and thank the Court for its time and attention to this matter.

Respectfully submitted

/s/ Sean J. Kirby  
Sean J. Kirby

cc: All counsel of record (via ECF)